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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

KRISTINA HERNANDEZ and JULIE
VARON, individually
and on behalf of all others similarly
situated,

Plaintiffs,

v.

EVENT TICKETS CENTER, INC. and
TICKETNETWORK, INC.,

Defendants.

Case No. 2:24-cv-01983-DAD-AC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND CASE SCHEDULE**

STIPULATION

Pursuant to Fed. R. Civ. P. 6, Plaintiffs Kristina Hernandez and Julie Varon (“Plaintiffs”) and Defendants Event Tickets Center, Inc. and TicketNetwork, Inc. (“Defendants,” and together with Plaintiffs, the “Parties”), by and through their respective counsel of record, stipulate as follows:

WHEREAS, on November 14, 2024, the Court issued a Scheduling Order setting forth case deadlines including the completion of fact and expert discovery, the deadline to file dispositive motions, the final pretrial conference, and the date of trial (Dkt. 15);

WHEREAS, the Parties, having met and conferred, jointly agree that an approximately 90-day extension of the current deadlines under Rule 16(b) is necessary and supported by good cause;

WHEREAS, Plaintiffs and Defendant Event Tickets Center, Inc. (“ETC”) have diligently litigated the case in an effort to comply with the existing case deadlines, including by fully briefing a motion to dismiss, fully briefing a motion to compel arbitration, serving discovery, and preparing discovery motions;

WHEREAS, through discovery, Plaintiffs learned that another entity, Defendant TicketNetwork, Inc. (“TicketNetwork” or “TN”), should be added to this case as a defendant due to its role in furnishing and operating the platform for the Event Tickets Center website (*see* Dkt. 42);

WHEREAS, upon learning of Defendant TicketNetwork’s relevance to the case, Plaintiffs sought leave to file a Second Amended Complaint to add TicketNetwork as a defendant (Dkt. 42);

WHEREAS, the Court granted Plaintiffs’ Motion for Leave to Amend on June 4, 2025 (Dkt. 44);

WHEREAS, Plaintiffs filed their Second Amended Complaint on June 5, 2025 (Dkt. 45);

WHEREAS, an extension of currently existing case deadlines is necessary now that TicketNetwork has been added to the case to give TicketNetwork time to respond to the Second Amended Complaint and to complete fact discovery. The Parties need to serve additional written discovery and take depositions of fact witnesses now that TicketNetwork is a defendant;

WHEREAS, the Parties have diligently sought amendment to the Scheduling Order once it became apparent that an extension would be necessary, as the Second Amended Complaint adding TicketNetwork as a defendant was filed on June 5, 2025 (Dkt. 45);

WHEREAS, the Parties propose the following proposed deadlines, which represent an approximately 90-day extension to each of the existing case deadlines.

Event	Existing Date	Proposed Date
Defendants' Deadline to respond to the Second Amended Complaint	June 20, 2025 (ETC) 21 days after Service (TN)	July 11, 2025
Completion of fact discovery	August 14, 2025	November 12, 2025
Initial expert disclosures and reports	September 15, 2025	December 15, 2025
Rebuttal expert disclosures and reports	October 15, 2025	January 13, 2026
Completion of expert discovery	November 14, 2025	February 12, 2026
Last day to file dispositive motions	January 5, 2026	April 7, 2026
Final pretrial conference	June 22, 2026 at 1:30 p.m.	September 21, 2026 at 1:30 p.m.
Jury trial begins	August 25, 2026 at 9:00 a.m.	November 30, 2026 at 9:00 a.m.

WHEREAS, this is the Parties' first request for an extension of time regarding the deadlines set forth in the Scheduling Order, and the stipulation is made in good faith and not for the purpose of causing unwarranted delay;

WHEREAS, the extension will not otherwise alter the date of any event or any deadline already fixed by Court order;

THE PARTIES STIPULATE AND REQUEST as follows:

The Scheduling Order shall be modified to extend the current deadlines by approximately 90 days as set forth below:

Event	Date
Defendants' Deadline to respond to the Second Amended Complaint	July 11, 2025
Completion of fact discovery	November 12, 2025

1	Initial expert disclosures and reports	December 15, 2025
2	Rebuttal expert disclosures and reports	January 13, 2026
3	Completion of expert discovery	February 12, 2026
4	Last day to file dispositive motions	April 7, 2026
5	Final pretrial conference	September 21, 2026 at 1:30 p.m.
6	Jury trial begins	November 30, 2026 at 9:00 a.m.

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8 Dated: June 13, 2025

Respectfully submitted,
 By: /s/ Martin Brenner
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17 Dated: June 13, 2025

Respectfully submitted,
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*Attorneys for Defendant Event Tickets Center,
 Inc. and Defendant TicketNetwork, Inc.*

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

The Scheduling Order shall be modified to extend the current deadlines by 90 days as set forth below:

Event	Date
Defendants' Deadline to respond to the Second Amended Complaint	July 11, 2025
Completion of fact discovery	November 12, 2025
Initial expert disclosures and reports	December 15, 2025
Rebuttal expert disclosures and reports	January 13, 2026
Completion of expert discovery	February 12, 2026
Last day to file dispositive motions	April 7, 2026
Final pretrial conference	September 21, 2026 at 1:30 p.m.
Jury trial begins	November 30, 2026 at 9:00 a.m.

Dated:

Hon. Dale A. Drozd
UNITED STATES DISTRICT JUDGE